

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MAINE

\*\*\*\*\*

FEDERAL NATIONAL MORTGAGE ASSOC., \*

\*

Plaintiff \*

v. \*

Case No. 2:23-cv-00200-LEW

\*

NORMAN J. ESTES, ET AL., \*

\*

Defendant & \*

Parties-In- \*

Interest \*

\*\*\*\*\*

**ANSWER TO AMENDED COMPLAINT**

(Submitted by Party-In-Interest Unifund CCR Partners)

NOW COMES Unifund CCR Partners [hereinafter “Unifund”], by and through its undersigned counsel, and Answers Plaintiff’s Amended Complaint as follows:

1. Unifund admits the allegation of ¶1 of the Amended Complaint that Plaintiff and Defendant are citizens of different states, but Unifund lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of ¶1 of the Amended Complaint.

2. Unifund denies the allegations of ¶2 of the Amended Complaint.

3. Unifund admits the allegations of ¶3 of the Amended Complaint.

4. Unifund admits the allegations of ¶4 of the Amended Complaint.

5. Unifund admits the allegations of ¶5 of the Amended Complaint.

6. Unifund denies the allegation of ¶6 of the Amended Complaint that Midland Funding LLC is located at the location of its registered agent in Maine.

7. Unifund denies the allegation of ¶7 of the Amended Complaint that it is located at the location of its registered agent in Maine.

8. Unifund admits the allegations of ¶8 of the Amended Complaint.

9. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶9 of the Amended Complaint.

10. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶10 of the Amended Complaint.

11. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶11 of the Amended Complaint.

12. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶12 of the Amended Complaint.

13. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶13 of the Amended Complaint.

14. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶14 of the Amended Complaint.

15. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶15 of the Amended Complaint.

16. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶16 of the Amended Complaint.

17. Unifund admits the allegation of ¶17 of the Amended Complaint that Defendant Estes has received a discharge in bankruptcy of his personal liability to Plaintiff.

18. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶18 of the Amended Complaint.

19. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶19 of the Amended Complaint.

20. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶20 of the Amended Complaint.

21. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶21 of the Amended Complaint.

22. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶22 of the Amended Complaint.

23. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶23 of the Amended Complaint.

24. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶24 of the Amended Complaint.

25. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶25 of the Amended Complaint.

26. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶26 of the Amended Complaint.

27. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶27 of the Amended Complaint.

28. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶28 of the Amended Complaint.

29. Unifund admits the allegations of ¶29 of the Amended Complaint except that it lacks knowledge or information sufficient to form a belief about the truth of the allegation that it is “in fourth position behind Plaintiff’s Mortgage”.

30. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶30 of the Amended Complaint.

31. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶31 of the Amended Complaint.

32. In response to ¶32 of the Amended Complaint, Unifund repeats ¶¶1-31 of this Answer as if fully set forth herein.

33. Unifund admits the allegations of ¶33 of the Amended Complaint.

34. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶34 of the Amended Complaint.

35. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶35 of the Amended Complaint.

36. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶36 of the Amended Complaint.

37. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶37 of the Amended Complaint.

38. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶38 of the Amended Complaint.

39. Unifund has no response to ¶39 of the Amended Complaint because it contains no factual allegations but is instead a demand for relief from this Court.

40. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶40 of the Amended Complaint.

41. Unifund lacks knowledge or information sufficient to form a belief about the truth of the allegations of ¶41 of the Amended Complaint.

Respectfully Submitted

Date: September 18, 2023

/s/ Stanley Greenberg, Esq.

Stanley Greenberg, Esq.  
Attorney for  
Unifund CCR Partners

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